

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHARLES E. ANDERSON, Trustee on behalf of PAINTERS' DISTRICT COUNCIL NO. 30 PENISION FUND, PAINTERS' DISTRICT COUNCIL NO 30 HEALTH AND WELFARE FUND, and NORTHERN ILLINOIS PAINTERS, DECORACTORS AND DRYWALL FINSIHERS JOINT APPRENTICESHIP AND TRAINING FUND, DONALD STEADMAN, Trustee on behalf of the NORTHERN ILLINOIS PAINTING AND DRYWALL INSTITUTE, and the DISTRICT COUNCIL NO. 30 OF THE INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, AFL-CIO, a labor organization,

Plaintiffs,

ASHLAUR CONSTRUCTION COMPANY, INC., an Illinois corporation, and ZOLLIE CARRADINE, an Individual,

Defendants

ANSWER COMPLAINT

08C1499

JUDGE NORGLE MAGISTRATE JUDGE NOLAN

 FILED

MAY 0 2 2008 TG 2, ZODS MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT

- 1. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 2. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 3. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 4. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- Defendant has insufficient information to admit or deny paragraph 5 of plaintiff's complaint.
- Defendant has insufficient information to admit or deny paragraph 5 of plaintiff's complaint.

- 7. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 8. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 9. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 10. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 11. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 12. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 13. Defendant has insufficient information to accept or deny paragraph of plaintiff's complaint.
- 14. Defendant has insufficient information to accept or deny paragraph of plaintiff's complaint

WHEREFORE, Defendant request that this court grant the following relief:

(a) This matter be dismissed with prejudice.

COUNT II

- 15. Defendant allege and incorporate by reference paragraphs 1 through 14 above.
- 16. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 17. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 18. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 19. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 20. Defendant has insufficient information to admit or deny the allegations in paragraph 20 of plaintiff's complaints.
- 21 Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.

WHEREFORE, Defendant request that this court grant the following relief:

(b) This matter be dismissed with prejudice.

COUNT III

- 22. Defendant allege and incorporate by reference by paragraphs 1 through 21 above
- 23. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 24. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 25. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 26. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 27. Defendant has insufficient information to admit or deny the allegation in paragraph 27 of plaintiff's complaint.
- 28. Defendant has insufficient information to admit or deny the allegation in paragraph 27 of plaintiff's complaint.
- 29. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.
- 30. Defendant has insufficient information to admit or deny the allegation in paragraph 27 of plaintiff's complaint.
- 31. Defendant admits the allegations alleged in paragraph 1 of Plaintiff's complaint.

WHEREFORE, Defendant request that this court grant the following relief:

(c) This matter be dismissed with prejudice.

Respectfully Submitted

Defendant's Attorney

Theodore London ARDC No. 6244649 509 E. 75th St Chicago, Ill. 60619 (773) 994-1111